



**CONESTOGA-ROVERS  
& ASSOCIATES**

US EPA RECORDS CENTER REGION 5



497015

14496 Sheldon Road, Suite #200, Plymouth, MI 48170  
Telephone: 734-453-5123 Facsimile: 734-453-5201  
[www.CRAworld.com](http://www.CRAworld.com)

September 25, 2003

Reference No. 32664

Mr. Brian Kelly  
On-Site Coordinator  
United States Environmental Protection Agency  
Emergency Response Branch  
9311 Groh Road, Room 216  
Grosse Ile, Michigan 48138

Dear Mr. Kelly

Re: Air Monitoring Program  
Sybill Inc. Site - Detroit, Michigan

Conestoga-Rovers & Associates (CRA) is in receipt of your September 23, 2003 letter to Mr. Robert Schloesser expressing concern regarding air monitoring being conducted at the Sybill Inc. Site. It is CRA's understanding that these concerns relate to the following:

- Identification of the acting Health and Safety Officer (HSO) at the Site as defined in the Work Plan;
- The collection of daily background readings; and
- HSO familiarity with air monitoring equipment, action levels and units of measurement.

With respect to the first point, CRA has designated Mr. Russel Aylsworth as the HSO and he has been functioning in that capacity since the Removal Actions commenced in August 2003. On September 24, 2003 Mr. Gerald Plattenberg, a Certified Industrial Hygienist in the employ of CRA reviewed the responsibilities of the HSO with Mr. Aylsworth and, in particular, emphasized with him that, as the HSO, he is responsible for ensuring that monitoring being conducted at the Site by subcontractors is consistent with that required under CRA's Health and Safety Plan (HASP).

With respect to the collection of background readings, Mr. Aylsworth has been and continues to collect these at the beginning of the work day prior to commencement of Site activities. Mr. Aylsworth also has been and continues to collect readings at upwind locations of the Site every two hours during Site operations. While the former monitoring is required by the HASP, the latter monitoring is over and above the HASP requirements. Notwithstanding this, on September 24, 2003, Mr. Plattenberg reviewed the procedure for collecting daily background readings with Mr. Aylsworth stressing the importance of collecting background readings at the beginning of the day prior to authorizing the commencement of Site activities.

Finally, on September 24, 2003, CRA reviewed in detail with Mr. Aylsworth, the operation of the photoionization detector, the dust meter and the four gas meter to confirm his familiarity





**CONESTOGA-ROVERS  
& ASSOCIATES**

September 25, 2003

2

Reference No. 32264

with their operation and the implications associated with recorded measurements as provided in the HASP. This review was conducted by Mr. Plattenberg and included a review of the HSO's instrument calibration documentation, which indicates Mr. Aylsworth's familiarity with the instruments and their limitations. Mr. Plattenburg also reviewed the action levels with Mr. Aylsworth, and the implications of sustained readings above the established action levels. To further impress upon Mr. Aylsworth the importance of the action levels and the need to be able to react to exceedances of the action levels in a timely manner, the action levels have been copied into his field book for quick reference, as needed. In addition, the units of measurement on the instruments being used have been reviewed with Mr. Aylsworth by Mr. Plattenburg along with factors for converting from parts per billion to parts per million. Although Mr. Aylsworth demonstrated his ability to convert from parts per million to parts per billion and back again, appropriate conversion factors have been copied into his field book for future reference by Mr. Aylsworth, as needed.

We will continue to review HSO responsibilities, background sampling protocol and the operation of the monitoring equipment with Mr. Aylsworth for the remainder of the project. CRA trusts that the actions taken as outlined above address your concerns in this matter. CRA will review the air monitoring data generated to date and confirm with you the validity of that data under separate cover on or before October 7, 2003.

We appreciate the opportunity to address your concerns. Should you have any further concerns with respect to this matter, please do not hesitate to contact the undersigned.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Marc Gaudet, P. Eng.

MG/mma/1/STC.

c.c.: Robert Schloesser  
Russel Aylsworth  
Liz Faler  
Gerald Plattenberg